UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

FREEDOM FROM RELIGION	§	
FOUNDATION, INC.	§	
Plaintiff,	§	
	§	
-VS-	§	CAUSE NO. 1-16: CV-00233
	§	
GOVERNOR GREG ABBOTT, in his	§	
official and individual capacities, and	§	
ROD WELSH, Executive Director of the	§	
Texas State Preservation Board, in his	§	
official capacity,	§	
Defendants.	§	

<u>DECLARATION OF SAM GROVER IN SUPPORT OF</u> PLAINTIFF'S MOTION FOR ATTORNEY'S FEES

- I, Sam Grover, do hereby declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following is true and correct and based on my personal knowledge:
- I am Associate Counsel for the Plaintiff, Freedom From Religion Foundation, Inc.
 ("FFRF") and an attorney of record for the Plaintiff in this matter.
- 2. The vast majority of my professional expertise, experience as an attorney, and work product has involved violations of the First Amendment to the U.S. Constitution, including Establishment Clause, free exercise, and free speech issues.
- 3. I graduated from Boston University School of Law in May, 2012. During my time at Boston University I was an Articles Editor for the *American Journal of Law and Medicine* and authored a note published in that journal analyzing the constitutional implications of religious exemptions to the health insurance mandate in the Patient Protection and Affordable Care Act.
- 4. I was admitted to the State Bar of Massachusetts in November, 2012 (now in retired status) and have been an active member of the State Bar of Wisconsin since April 10, 2014. I am

admitted to practice in the Western District of Wisconsin (December 12, 2014), the Western District of Texas (March 7, 2016), the Fifth Circuit Court of Appeals (October 7, 2016), and the Seventh Circuit Courts of Appeals (September 1, 2017). I have, at all times, been a member in good standing in each bar and court to which I have been admitted.

- 5. I have been employed by the Freedom From Religion Foundation since October, 2013, during which time my duties have primarily included analyzing and processing complaints regarding violations of the First Amendment. I also worked as a legal intern for FFRF in the summer of 2010, during which time I drafted letters of complaint and educational letters to government entities regarding the constitutional separation of religion and government.
- 6. In my capacity as an attorney for FFRF I have litigated First Amendment cases in federal district courts across the country, including Georgia, Indiana, Wisconsin, the District of Columbia, and Texas, including two cases in the Western District of Texas. In total I have been FFRF's lead attorney on seven cases, including this matter, as well as:
 - FFRF v. Judge Wayne Mack, No. 4:17-881 (S.D. Tex. filed Mar. 21, 2017) (bringing Establishment Clause challenge to a justice of the peace's practice of opening each court session with clergy-led prayer);
 - FFRF v. Concord Cmty. Schs., 240 F. Supp. 3d 914 (N.D. Ind. 2017), aff'd, 885 F.3d 1038 (7th Cir. Mar. 21, 2018) (ruling that school's 45-year practice of including a live nativity scene with bible recitation at each winter concert violated the Establishment Clause and approving of new practice);
 - FFRF v. Brewster Cty., No. 4:16-014 (W.D. Tex. June 13, 2016) (issuing consent decree and order to remove cross decals from county law enforcement vehicles and concurrently dismissing Establishment Clause challenge to the decals);
 - FFRF v. Franklin Cty., No. 1:15-484 (S.D. Ind. Dec. 17, 2015) (granting stipulation of dismissal to First Amendment challenge to county's policy prohibiting nonresidents from participating in county's display forum after county revised its policy to allow plaintiffs' displays);
 - FFRF v. Emanuel Cty. Sch. Sys., No. 6:15-013 (S.D. Ga. Oct. 8, 2015) (granting stipulation of dismissal to First Amendment challenge to school employee conduct promoting prayer and other religious activities after settlement agreement);
 - FFRF v. Franklin Cty., 133 F. Supp. 3d 1154 (S.D. Ind. 2015) (dismissing Establishment Clause challenge to county's practice of displaying nativity scene on

- courthouse lawn each December after plaintiffs' voluntary withdrawal of request for injunctive relief, given county's new ordinance to allow additional displays).
- 7. I have coordinated, advised, and provided research and drafting support on numerous additional First Amendment cases on behalf of FFRF, most notably:
 - FFRF v. Trump, No. 3:17-330 (W.D. Wis. Dec. 14, 2017) (accepting voluntary dismissal of Establishment Clause, equal protection, and Take Care Clause challenge to President Trump's May 4, 2017 Executive Order on IRS enforcement of the Johnson Amendment, after Justice Department stated the EO had no effect);
 - Barker v. Conroy, No. 1:16-850 (D.D.C. Oct. 11, 2017), appeal docketed, No. 17-5278 (D.C. Cir. Dec. 20, 2017) (on appeal after ruling that the chaplain for the House of Representatives did not violate the Establishment Clause, equal protection, Religious Freedom Restoration Act, or Religious Test Clause by refusing to allow an atheist to deliver the House's opening prayer as a guest chaplain);
 - FFRF v. Office of Comm'r of Ins., No. 14-3429 (Dane Cty. Cir. Ct. Nov. 24, 2015) (awarding attorney fees and statutory damages to plaintiffs after challenge brought under state open records law);
 - FFRF v. Lew, 773 F.3d 815 (7th Cir. 2014) (vacating for lack of standing Establishment Clause and equal protection challenge to federal income tax housing allowance exemption for "ministers of the gospel").
- 8. In addition to litigation, I have also co-authored *amicus curiae* briefs to the Fifth Circuit Court of Appeals and Ninth Circuit Court of Appeals, as well as consulted on *amicus* briefs to the Eleventh Circuit Court of Appeals, Colorado Court of Appeals, and Wisconsin's Dane County Circuit Court. All of these briefs concerned Establishment Clause and other First Amendment issues.
- 9. In addition to litigation work, I also regularly write legal demand and educational letters to various state and federal authorities and negotiate with those entities regarding Establishment Clause and other constitutional violations. Since 2014, through this non-litigation legal advocacy I have attained approximately 250 known victories for FFRF complainants.
- 10. I have presented two continuing legal education (CLE) programs on First Amendment religion clause issues. In May, 2018 I presented on the radical redefinition of

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"religious freedom" at a Dallas Bar Association event. I also participated in a program entitled "Chipping Away the Wall of Separation – A Survey of Recent Supreme Court Cases Regarding the Establishment Clause" at a Legal Association for Women event in Madison, Wisconsin in August, 2014.

- 11. I have also given numerous educational lectures on First Amendment issues around the country, including:
 - FFRF: Fighting the Good Fight for Separation of Church and State, Unitarian Universalist Society of Iowa City, Iowa City, IA (Apr. 2018);
 - The Future of Church/State Separation: A Legal Perspective, Winchester Academy, Waupaca, WI (Oct. 2017);
 - Protect the First Amendment It Protects You, Reason Rally, Washington D.C. (June 2016);
 - Secular Student Activism Rights on Campus, Southwest Secular Student Conference (SwssCon), Claremont, CA (Sept. 2015);
 - Secular Students Rights on Campus, Secular Student Alliance (SSA) Annual Conference, Ohio State University in Columbus, OH (July 2015);
 - Presentation to the Southeast Wisconsin FreeThinkers, Cudahy, WI (June 2015);
 - Debate on Religion in the Public Schools, Rhinelander High School, Rhinelander, WI (Oct. 2014).

Attorney's Fees

12. An itemization of the hours I have worked on this case and the work performed is attached to this declaration as Exhibit A. It is a true and correct summary and cumulative total of the hours I have spent working on this case, which total 145 hours and 50 minutes. As noted though, it does not include entries for time I spent coordinating or applying for FFRF's 2015 display, regular communications with my client (FFRF), communicating with the media about the case, or recording my hours in the time log. Plaintiff is not seeking compensation for those excluded activities, or for any other activity where "excluded" has been listed under the column meant for recording the hours worked.

- Due to my experience and expertise in First Amendment law, and Establishment Clause and free speech law specifically, plus my understanding of the hourly rates typically charged by attorneys with similar experience and expertise in the Austin area, I believe that \$350 per hour is a reasonable hourly rate for my work in this case.
- 14. The hours I dedicated to this matter were reasonable and inextricably intertwined with FFRF's free speech claims in that they arose from the same facts and were based on related legal theories.

Executed on this 3 day of July, 2018.

Sam Grover

Exhibit A -

Attorney Grover Time Log

Date De	escription	Duration		Total time:	145:50:00
1/5/16 co	ollected communications to State Preservation Board	0:20		Rate:	\$350/hour
1/6/16 ini	nitial planning meeting with Atty Bolton & Atty Elliott	1:25		Total fees:	\$51,041.55
1/7/16 re	esearch for complaint on forums, free speech	2:30			
1/11/16 re	eviewed attorney admission process for W.D. Tex	excluded			
1/12/16 be	egan drafting complaint	1:00			
1/13/16 co	ontinued drafting complaint	3:35			
1/13/16 ga	athered photos of SPB removing FFRF's display	0:15			
	inished drafting complaint first draft	1:25			
1/22/16 fir	nished collecting info for W.D. Tex applications	excluded			
	iscussed complaint strategy	0:35			
	esearched sovereign immunity	1:25			
	eviewed Atty Bolton's draft complaint	1:40	no	entries include	ed for:
	dited Atty Bolton's draft complaint	0:45		ne spent on 201	
	urther edits to draft complaint and research into 11th Amendment	1:15	_	olication and co	
	onsolidated edits to draft complaint	1:05		ular communi	-
	worn in to Western District of Texas	excluded	clie	ent (FFRF), med	ia
	eviewed defendant's motion to dismiss (MTD)	2:10	coı	mmunication,	time spent
	esearched 12(b)(6) standard of review	0:20		ording the ent	ries in this
	esearched 12(d) applicability	0:20	tim	ne log.	
	neeting with Atty Bolton & Atty Elliott on response to MTD	1:00			
	esearched qualified immunity section of reply to MTD	4:05			
	pegan drafting qualified immunity section of reply to MTD	2:35		1	
	nished drafting qualified immunity section of reply to MTD	4:20			
	all with Atty Bolton about reply to MTD vs amended complaint	0:20			
	· · · ·				
	dited amended complaint	1:15			
	dited amended complaint	0:45			
	eviewed new MTD	0:30			
	dited response: added argument, changed citations	2:40			
	iscussion over proposed settlement terms with Atty Elliott and FFRF Co-	0.50			
	resident Annie Laurie Gaylor	0:50			
	eview of plaintiffs' requests for production	0:15			
	eviewed answers to complaint	0:30			
	eviewed requests for production with Atty Elliott and FFRF Co-President				
	nnie Laurie Gaylor	0:20			
	pegan collecting responsive documents (emails with SPB)	0:25			
m	neeting with Atty Bolton & Atty Elliott to discuss need for depositions and				
	nterrogatories	0:35			
	rrote 2016 display application and sponsorship request form (0:40)	excluded			
	eviewed defendant's initial disclosures	0:20			
со	ontinued collecting responsive documents to RFP (internal emails, emails				
7/21/16 wi	rith local Texas contact Arturo)	1:15			
re	eviewed defendants' provided documents for interesting approved				
8/2/16 ex	xhibits, discussion of the nativity scene; discussed results with Atty Elliott	1:55			
со	ontinued collecting responsive documents to RFP (Jacob Fortin and				
	emple displays emails, Freethought Today articles, Twitter, FFRF News				
	mails, Facebook, Freethought Radio)	5:10			
	orted, checked content, and scanned all collected documents for RFP	1:45			
	reated privilege log	0:15			
	neeting Atty Bolton & Atty Elliott about need for deposition, SJ motion	1120			
8/8/16 sti		0:15			
	dited proposed stipulated facts	1:30			
	dited declaration of Sam Grover	1:25			

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7/13/17 reviewed Dkt. 64 and sent thoughts to Atty Bolton meeting with Atty Bolton & Atty Elliott on 30(b)(6) deposition and 7/19/17 dispositive motions due date 1:15 7/28/17 reviewed P's 2d MSJ 7/28/17 reviewed D's 2d MSJ 7/28/17 meeting with Atty Bolton & Atty Elliott about resp to D's 2d MSJ 8/7/17 began drafting Grover #2 declaration 8/8/17 continued drafting Grover #2 declaration, with fact checking 3:40	6/29/17	wrote notes on John Sneed deposition testimony	1:50			
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8/7/17 began drafting Grover #2 declaration 0:30 8/8/17 continued drafting Grover #2 declaration, with fact checking 3:40						
8/8/17 continued drafting Grover #2 declaration, with fact checking 3:40						
			3:40			
8/11/17 modified Grover #2 declaration and prepared exhibits 1:50			1:50			
10/13/17 reviewed court ruling on SJ motions and emailed with client 0:45			0:45			
meeting with FFRF Co-President Dan Barker & Atty Elliott on decision and						
10/16/17 strategy 0:15	10/16/17		∩·15			

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11/2/17	discussion of options after appeal filed with Atty Bolton & Atty Elliott	0:30	
	review of proposed Motion for Entry of Judgment & 2 conversations with		
2/5/18	Atty AElliott on proposed language	0:50	
2/6/17	began draft declaration in suport of motion for attorney's fees	0:15	
2/7/18	review of new draft of proposed Motion for Entry of Judgment	0:15	
2/7/18	continued drafting declaration in support of motion for attorney's fees	3:55	
2/8/17	finalized declaration in support of motion for attorney's fees	2:10	
4/25/18	email regarding joint resolution of issues	0:10	
4/27/18	met with Atty Bolton to discuss options on voluntary dismissal of claims	0:20	
	email to Atty Bolton and discussion with Atty Elliott on resolving		
5/1/18	outstanding claims	0:15	
	discussion with Atty Elliott on joint stipulation and entry of final judgment,		
5/4/18	email to Atty Bolton	0:15	
5/30/18	began drafting Second Motion for Entry of Judgment	0:25	
	research into requirements for entry of final judgment and continued		
5/31/18	drafting of Second Motion for Entry of Judgment	1:55	
6/8/18	continued drafting second motion for entry of judgment	0:45	
6/15/18	research into remedies; finalized second motion for entry of judgment	2:25	
6/15/18	research into remedies; drafted proposed final judgment order	2:00	
6/20/18	read final judgment	0:05	
6/26/18	updates to atty fees declaration	1:20	